

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WENDY GAUTHIER,

Plaintiff,

v.

SUNHEALTH SPECIALTY SERVICES,
INC. and SUNBRIDGE HEALTHCARE
CORPORATION,

Defendants.

Civil Action No.: 4:05-cv-40119

**DEFENDANTS' MOTION TO EXTEND THE DEADLINES IN THE PRETRIAL
SCHEDULING ORDER BY THIRTY DAYS**

The Defendants, SunHealth Specialty Services, Inc. and SunBridge Healthcare Corporation, hereby request that the Pretrial Scheduling Order, issued by U.S. District Court Judge F. Dennis Saylor IV and modified on December 11, 2006, be extended as follows:

- (1) That the deadline for the filing of dispositive motions be extended for thirty (30) days, resulting in such motions coming due on April 2, 2007, with response(s) due on May 2, 2007; and
- (2) That the motion hearing for dispositive motions to be set for June 1, 2007.

The Defendants make this request for the following reasons:

1. The current deadline for the filing of dispositive motions is March 2, 2007, with responses due March 30, 2007, and hearing set for May 2, 2007.
2. The Defendants have good cause for which to request a 30-day extension of the deadline, as they have not yet received the court reporter's transcript from the deposition of the Plaintiff,

Wendy Gauthier, which deposition took place on February 8, 2007, and is scheduled to be completed on March 5, 2006.

3. Any dispositive motion to be brought by the Defendants, including Motions for Summary Judgment, would require the transcript of the Plaintiff's deposition in order to establish the existence or lack of existence of genuine issues of material facts.

4. Further, Michael Williams, counsel for the Defendants, is scheduled to be on trial in U.S. District Court for the District of Connecticut, in Hartford, CT, for the week ending March 2, 2007.

WHEREFORE, the Defendant request that the deadlines listed in this Court's most recent Order be extended by thirty (30) days, as reflected above.

Respectfully submitted,
SunHealth Specialty Services, Inc., and
SunBridge Healthcare Corporation,
By their attorneys,

/s/ James M. Henry

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Signed and Submitted: February 23, 2007

Rule 7.1 Certification

I hereby certify that on February 22 and 23, 2007, via exchange of telephone, fax and e-mail messages, the parties conferred in a good faith attempt to resolve or narrow the issue, and were not able to agree on the proposed 30-day deadline extension. Plaintiff's counsel indicated that he would not oppose a 14-day extension of the schedule.

/s/ James M. Henry